



Connexum LLC Redacted Version of RMD 2026

CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WC
DOCKET NO. 17-97 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION



This document details the reasonable steps and actions taken by Connexum, LLC. to mitigate and eliminate illegal robocalling. Connexum LLC has an ongoing commitment to scan for and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combating fraudulent voice activity.

Connexum LLC's Role in the call chain:

Connexum LLC is not an affiliate, subsidiary, or parent company of any other company. Its managing member is the sole owner of the company, and Connexum LLC, registered in Sheridan WY has never been sold or acquired by another company. Connexum is a Voice Service Provider, reselling international and US Domestic telephone calls and DID services to both foreign and domestic carriers and gateway providers. We send or receive calls from either VSP's or other intermediate providers. We send calls to other intermediate providers.

Know Your Customer (KYC):

- The Company provides service to carrier customers and requires potential customers to complete a written comprehensive Profile which includes their legal information, filer and exemption information, industry and financial references, as well as other pertinent data to verify that the carrier is a registered with the Robocall Mitigation Database, in good standing and certified to provide telecommunication services.
 - We do not accept customers without a corporate e-mail address (no gmail, yahoo, msn, etc.)
 - We verify the customer website is active
 - We verify the corporate street address is valid
 - We only accept payments via bank transfer (wire, ACH, Zelle or credit card), we do not accept PayPal or any form of cryptocurrency.
 - If the company finds that the client is violating the restrictions or changes any of the registered information above and the customer fails to remediate and detail the case of said irregularities, the company will take action such as suspension or termination of interconnection.
 - Similar standards are applied to our vendors.
- The company performs the following Robocall Mitigation procedures:

STIR/SHAKEN COMPLIANCE:

The Company has implemented STIR/SHAKEN in partnership with Sansay as the STI-Certificate Authority (STI-CA) service provider for Company. The OCN for the company is 203K.

- The company's network passes STIR/SHAKEN tokens as received.
- The company does not modify or change the level of certification received.
- The company has the ability to block calls that are either not signed with



Robocall Mitigation Plan 2026

STIR/SHAKEN or that have an incorrect certificate.

- The company is actively blocking unsigned calls from upstream carriers it deems should have been able to or that were obligated to sign.
- The company can sign calls for carriers who are unable to sign due to documented technical reasons.
- The company does sign calls where the DID of the call was provided through the company.

ANTI-ROBOCALLING PROTOCOLS:AND MITIGATION ANALYTICS

The company has implemented several network wide and customer specific analytics and restrictions meant to identify and curb any potential non-compliant traffic, these filters include:

- Preventing Identity spoofing
 - We have a network wide ANI Blacklist. Calls from these ANI's are blocked. This curated, proprietary list is over 1 million active numbers in the USA and over 200 thousand numbers in Canada. ANI's from any Tracebacks, network trouble tickets or legal inquiries are also added to this list.
- Supporting the Truth in Caller ID Act
 - Blocking of any call originating from a disconnected ANI
 - We maintain a curated list of disconnected numbers which is refreshed on a rolling 90 day cycle. This list has over 72 million inactive, but assignable numbers on it.
 - Blocking of any call with a U.S. Wireless ANI
- Supporting the National DNC list:
 - We offer blocking of any calls to a DNIS on the national DNC list
- Third Party resources
 - **YouMail** The company is subscribed to **YouMail**. **YouMail** provides a realtime database that scores the probability of an ANI producing SPAM, Fraud, or calls violating TCPA regulations.
 - ANI's with a high Fraud Likely score are blocked.
 - **NoMoRoBo** the company also cross-references ANI's with the **NoMoRoBo** web site to gain further potential Spam insights.
 - **SmartShield** functionality of the **Veriswitch** Platform s used daily to assess live traffic and hunt for fraud.

Proactive discovery of Likely Fraud Actors

Blocking of inbound Media IPs that are determined to produce fraud calls

ITG CO-OPERATION:

- Connexum LLC will respond within 24 hours any new traceback case as required by US Telecom Industry Group (ITG), most often within 2 hours or less. We will also communicate to the client about the traceback, and we will implement a probationary period during which further tracebacks would trigger progressive suspension or termination.
- Connexum LLC also regularly reviews the USTA Traceback website for data to identify high risk (non-responsive carriers) for additional KYC scrutiny.



Robocall Mitigation Plan 2026

RMD Filing:

- Connexum LLC RMD filings are fully up to date.
- Connexum LLC is not prohibited to file in the RMD.
- Any changes to this filing for Connexum LLC will be updated within 10 days of the change.

FCC investigations:

- Connexum LLC is not and has not been part of any formal FCC, law enforcement, or regulatory agency action or investigation within the last two years.

Connexum LLC Officer Responsible for RMD Related Issues

Christopher G. Hall
Managing Member
Connexum LLC
1122 E. Lincoln Ave.
Suite 203
Orange, CA 92865
O: (714) 223-9223
E: chall@connexumllc.com